

REMARKS

Claims 1 to 12, 14, and 16 to 20 are in the application, of which claims 1, 12 and 17 are independent. Favorable reconsideration and further examination are respectfully requested.

Claim 7 was rejected under the second paragraph of §112 for allegedly being unclear. The Office Action stated the following:

1. Claim 7 is rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.
2. In claim 7, the phrase "the method is performed by a server, and further comprises: performing load balancing to select the server from among plural servers" is unclear and vague. Especially, it is very unclear as to what Applicant is intended by "select the server". Which server will be selected from a server?

We respectfully submit that claim 7 is not unclear since "the server" that is being selected is the server that is performing the method, as clearly stated in the claim. Nevertheless, claim 7 has been amended above to provide further clarification. Accordingly, withdrawal of the §112 rejection is respectfully requested.

Turning to the art rejections, claims 1 to 6, 8, and 10 to 20 were rejected over U.S. Patent No. 7,116,681 (Hovell) and U.S. Patent No. 6,336,135 (Niblett); claim 7 was rejected over Hovell, Niblett and U.S. Patent No. 6,023,722 (Coyler); and claim 9 was rejected over Hovell, Niblett and U.S. Patent Publication No. 2004/0138786 (Blackwell).

As shown above, the claims have been amended. In view of these amendments, withdrawal of the art rejections is respectfully requested.

Amended independent claim 1 recites that the client application is behind a first firewall, that the server application is behind a second firewall, and that the method is performed by at least one device that is not behind either the first firewall or the second firewall. Claim 1 also recites that the method includes receiving, from the client application, a command to obtain data in the at least one queue destined for the client application, and receiving, from the server application, a command to obtain data in the at least one queue destined for the server application. Because the client application and the server application are both behind firewalls, users outside of their respective local networks cannot initiate communication to the client application and the server application. Therefore, data passed between the client application and the server application is stored in the at least one queue, and the client application and the server application send commands to obtain their respective data, which are those commands received in claim 1.

The applied art is not understood to disclose or to suggest the features of claim 1. For example, Hovell does establishing a tunnel from an IPV6 domain 12 through an IPV4 domain 10 to another IPV6 domain 14 (see Fig. 1, which is reproduced below).

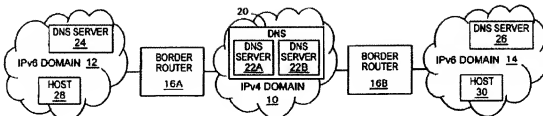


Fig. 1

However, in Hovell, neither the IPV6 domain 12 nor the IPV6 domain 14 is behind a firewall. As such, communications can be initiated to addresses in either IPV6 domain.

For example, as described in column 6, host 28 requests the address of host 30.

25 until it learns about the DNS server 26. Finally, a DNS Request message (not shown) will go to the DNS server 26 requesting the IPV6 address of the destination host 30. As the DNS request passes from the first IPV6 domain 12 through the border router 16A to the IPV4 domain 10, it is processed by a protocol converter (PC) 32A (see FIG. 2) and undergoes IPV6/IPV4 translation. Correspondingly, as the DNS request

Then, as described in column 8,

30 Upon receipt of the resultant IPV6 DNS Response message 54, the source host 28 retrieves the IPV6 address from its address record 60 and stores it in its internal memory for use in sending data packets to the destination host 30.

Thus, in Hovell, the source knows the address of the destination. As such, there is no need for the source to output a command to obtain data in a queue destined for the source, and (correspondingly) for the destination to output a command to obtain data in a queue destined for the destination. Rather, the source and the destination know each others' addresses, and include that information in their messages. The border routers and DNS

server 20 performs actions necessary, including protocol conversions, to forward such messages over the IPV4 domain, as described in column 9:

The above described mechanism provides for an IPv6 host, which is in an isolated IPv6 domain, to communicate 25 with another IPv6 host, which is in another isolated IPv6 domain, via an intermediate IPv4 domain, without any knowledge of where that other IPv6 host is, and without the source IPv6 host needing to do anything different from a standard communication procedure with another IPv6 host 30 within its own IPv6 domain. The DNS server local to the source IPv6 host makes a Request via the IPV4 domain to the IPv6 DNS server that is on the same network as the destination IPv6 host, and the border routers automatically set up respective mappings associating the tunnel endpoint 35 and the IPv6 address of the IPv6 hosts behind the border routers.

Referring to claim 13, the Office Action alleges that Hovell discloses polling.¹

Specifically, the Office Action states

14. Claim 13, Hovell and Niblett disclose the invention substantially as claimed.

Hovell teaches wherein the proxy (i.e. router 16A) polls the server (i.e. DNS 20) for data for the client application (i.e. the router 16A extracts the IPV4 address of the 6to4 tunnel endpoint from the DNS 20) (fig. 1&2; and Col. 6, L. 3-7; and Col. 11, L.4-L. 67).

However, as described in column 10 below, a router 16A, 16B extracts the tunnel endpoint from received packets. It does not poll DNS 20 for that information.

¹ Office Action, page 8

- 10 In some variants of these embodiments, the controller
64A is arranged to recognise the presence of this prefix
within the retrieved destination address of a received packet
and to command the 6to4 tunnelling encapsulator 90A to
handle the received packet, and in this case the 6to4 tun-
15 nelling encapsulator 90A is arranged to retrieve the special
IPv6 address and to extract from its second part 98 the IPv4
address of the 6to4 tunnel endpoint.

The citation in the Office Action to polling at column 6 merely describes DNS server 20:

- 5 The IPv4 domain 10 contains a complete domain name
system (DNS) 20 including a plurality of DNS servers 22, of
which only two DNS servers 22A and 22B are shown, and
the IPv6 domains 12 and 14 contain respective DNS servers
24 and 26.

The citation in the Office Action to polling at column 11 describes the inner workings of
the border routers, not interaction between the border routers and DNS server 20.

Niblett, which was cited for its alleged disclosure of a session identifier and queue
for storing session communications, is not understood to add anything that would remedy
the foregoing deficiencies of Hovell vis-à-vis claim 1. Accordingly, claim 1 is believed to
be patentable over the art. Claims 12 and 17 include features similar to claim 1, and are
believed to be patentable for at least the same reasons set forth above.

Each of the dependent claims is also believed to define patentable features of the
invention. Each dependent claim partakes of the novelty of its corresponding independent
claim and, as such, has not been discussed specifically herein.

It is believed that all of the pending claims have been addressed. However, the
absence of a reply to a specific rejection, issue or comment does not signify agreement
with or concession of that rejection, issue or comment. In addition, because the arguments

made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

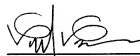
In view of the foregoing amendments and remarks, the entire application is believed to be in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

Applicant's attorney can be reached at the address shown below. Telephone calls regarding this application should be directed to 617-521-7896.

Please apply any fees due for this Amendment to Deposit Account 06-1050 referencing 11333-026001.

Respectfully submitted,

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Paul A. Pysher
Reg. No. 40,780

Fish & Richardson P.C.
225 Franklin Street
Boston, MA 02110-2804
Telephone: (617) 542-5070
Facsimile: (617) 542-8906